



March 18, 2015

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

Re: *Notice of Ex Parte Communication*  
CC Docket No. 95-116; WC Docket No. 07-149; WC Docket No. 09-109

Dear Ms. Dortch:

On March 17, 2015, I, Richard Gephardt, on behalf of Neustar, Inc., spoke by telephone to FCC Commissioner Mignon Clyburn and her Chief of Staff, Adonis Hoffman, to discuss concerns raised by a potential transition of the contract for the Number Portability Administration Center ("NPAC") to a new Local Number Portability Administrator ("LNPA").

On the call we discussed the Commission's March 4, 2015, announcement that the Wireline Competition Bureau had circulated a draft order to the Commissioners which, if adopted, would initiate contract negotiations with Telcordia (d/b/a iconectiv), a wholly owned subsidiary of Ericsson, to serve as the next LNPA. I expressed concern that the Commission was preparing to award the NPAC contract before conducting the proper analysis of the many issues involved in the administration of local number portability. In particular, I noted that a failed transition could have a significant negative impact on the competitiveness of smaller carriers. I also noted that Ericsson would not meet the neutrality standard previously required of Neustar by the FCC, since its parent company has other business relations with several carriers. Its non-neutrality could also adversely impact the competitiveness of smaller carriers.

Rather than moving forward based on an incomplete record, I recommended that the Commission fully evaluate the implications of awarding the NPAC contract to a new LNPA before taking any actions.

Respectfully submitted,

A handwritten signature in blue ink, reading "Richard A. Gephardt". The signature is fluid and cursive, with a long horizontal stroke at the end.

Richard A. Gephardt

President and CEO

Gephardt Government Affairs

(202) 403-2150